

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ANDY KIM, et al.,

Plaintiffs

, v.

CHRISTINE GIORDANO HANLON,
in her capacity as Monmouth County
Clerk, et al.,

Defendants.

Civ. Action. No.: 3:24-cv-01098

APPLICATION TO FILE OVERLENGTH BRIEF

Pursuant to Local Rule 7.2(b), Defendant Christine Giordano Hanlon, in her official capacity as Monmouth County Clerk (“Defendant Hanlon”), herein respectfully moves for leave to file an overlength brief in opposition to Plaintiffs’ motion for a preliminary injunction. As grounds for this application, Defendant Hanlon states:

1. On February 26, 2024, the plaintiffs filed a Motion and Order to Show Cause for Preliminary Injunction which brief filed in support thereof was 54 pages in length, presented multiple expert opinions and raised complex legal issues, including analyzing case law, relating to Plaintiffs allegations that Defendant Hanlon and the eighteen other County Clerk defendants violated various rights conferred by the First and Fourteenth Amendment, and violated the Elections

Clause of the United States Constitution.

2. As presented by the Plaintiffs to the Court in their Application to File an Overlength Brief filed on February 27, 2024, and subsequently granted by the Court on February 29, 2024, extensive briefing is required in order to properly and clearly address the issues raised by the Plaintiffs to the Court in their Motion for Preliminary Injunction.

3. Given the length and complexity of Plaintiffs' brief, Defendant Hanlon respectfully requests leave to submit an over-length brief in accordance with Local Rule 7.2(b).

4. We believe that, 40 pages is insufficient to adequately respond to Plaintiffs' Motion for preliminary injunction. Therefore, we respectfully request that this Court allow Defendant Hanlon to file a brief in opposition to Plaintiffs motion no longer than 54 pages.

Respectfully submitted,

SPIRO HARRISON & NELSON LLC

Date: March 6, 2024

By: /s/Jason C. Spiro
JASON C. SPIRO, ESQ.
200 Monmouth Street, Suite 310
Red Bank, New Jersey 07701
Attorneys for Defendant,
Christine Giordano Hanlon, in her official
capacity as Monmouth County Clerk